

EXHIBIT A

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA,

Plaintiff, *
vs.

MATTHEW K. WALSH, * Case No. 1:21-cr-00161

Defendant. *

MOTION FOR REVOCATION OF DETENTION ORDER

NOW COMES, the Defendant, Matthew K. Walsh, by and through his attorneys, James E. Crawford, Jr., Esquire, and the Law Office of James E. Crawford, Jr. & Associates, LLC, pursuant to 18 U.S.C. § 3145(b), and respectfully moves this Court to revoke the Order of Detention of the Honorable J. Mark Coulson, U.S. Magistrate Judge, entered on May 24, 2021, and release the Defendant on electronic monitoring pending trial. In support of the foregoing the Defendant states as follows:

1. On May 12, 2021, the Defendant was charged by criminal indictment with Sexual Exploitation of a Minor in violation of 18 U.S.C. § 2251(a), (e); Coercion and Enticement in violation of 18 U.S.C. §§ 2422(b), 2427; and Receipt of Child Pornography in violation of 18 U.S.C. § 2252A(a)(2).
 2. On May 14, 2021, the Defendant appeared for his initial appearance and was detained pending a detention hearing.

3. On May 24, 2021, the Defendant appeared for a detention hearing before a U.S. Magistrate Judge, the Honorable J. Mark Coulson. Judge Colson issued a detention order, stating, *inter alia*, that although the Defendant does not present a risk of flight, he does pose a risk of harm to the community at large and no conditions can alleviate this risk.
4. The Defendant respectfully requests that this Court revoke Judge Coulson's detention order and allow the Defendant to be released with the proper conditions that would alleviate any risk of harm to the community, namely, home detention with electronic monitoring and no access to the internet.
5. The Federal Bureau of Investigation executed a search warrant on the Defendant's home on April 21, 2021, and seized his cellphone, laptop, and smart watch. The Defendant is not in possession of any additional electronic device and therefore does not have access to the internet. Further, the Defendant's family will remove internet access from their home entirely by removing the router, and each family member living within the home will not own a smartphone with internet capabilities. An order of home detention with electronic monitoring will ensure that the Defendant remains within his home and therefore will have no access to the internet whatsoever. Thus, the Defendant will not pose a danger to the community if released pending his trial.
6. Further, the Defendant was clinically evaluated on May 3, 2021 by a Board Certified Professional Counselor at Anne Arundel Counseling located in Glen Burnie, Maryland for a psycho-sexual assessment to determine risk of reoffending and to recommend viable treatment options. The Defendant received low-risk scores in Sexual Adjustment History Assessment, Decision Risk Assessment Matrix, and Rosenberg Historical Risk Assessment, indicating that he is clinically of low-risk to reoffend.

7. The Defendant's physical and mental health and wellbeing are also at significant risk of harm if he remains detained pending trial in this matter. Regarding his physical health, the Defendant suffers from chronic severe heart conditions that can be fatal if untreated. Specifically, he is diagnosed with hypertrophic cardiomyopathy and a bicuspid aortic valve, conditions which can lead to blood clots, stroke, and sudden fatal heart failure. The Defendant is prescribed 50mg of the beta blocker Metoprolol Succinate ER to maintain the regular functionality of his heart, which cannot be stopped abruptly or have a dosage skipped without a weaning period at risk of significant heart failure. Upon information and belief, since the Defendant was detained on May 14, 2021, his heart medication prescription, dosage, and schedule have been altered or foregone completely by the detention center on a consistent basis. Regarding his mental health, the Defendant has been regularly seeing a psychotherapist since the age of eight. In 2014, the Defendant underwent a clinical psychological evaluation at the Johns Hopkins Hospital Division of Child and Adolescent Psychiatry, Department of Psychiatry and Behavioral Sciences. That evaluation revealed diagnostic impressions that the Defendant suffers from Generalized Anxiety Disorder, Social Phobia, and Depressive Disorder. He has continued to struggle with these mental health issues throughout his life, and, in the instant case was placed in the Inmate Mental Health Unit upon his arrival at the detention center. There are significant concerns regarding undiagnosed mental conditions, and the Defendant requires consistent further evaluation and counseling in to treat these conditions. Based upon the foregoing, the Defendant is in immediate need of professional health intervention and is at risk of severe physical and mental health repercussions if he is not released from detention.

8. Upon information and belief, it is clear that an order can be enforced ensuring that the Defendant has no access to the internet for the duration of pretrial release. It is further clear that the U.S. Probation and Pretrial Services Office has the ability to supervise the Defendant pending trial in this matter. Therefore, this Court should find that clear and convincing evidence exists that there are sufficient conditions available which will reasonably assure community safety.
 9. It is further respectfully requested that the Court hold an expedited hearing on this motion, as motions under 18 U.S.C. § 3145(b) "shall be determined promptly."
- WHEREFORE**, the Defendant, Matthew K. Walsh, respectfully requests that this Honorable Court grant the instant motion and order a revocation of the detention order and release the Defendant pending trial.

Respectfully submitted,

/s/

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REQUEST FOR A HEARING

Pursuant to Rule 105-6 of the Local Rules of the United States District Court for the District of Maryland, a hearing is requested on the Defendant's Motion.

/s/

JAMES E. CRAWFORD, JR., ESQUIRE

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 7th day of July, 2021, I filed an electronic copy of the foregoing Motion to For Revocation of Detention Order by CM/ECF which caused a copy to be transmitted to all parties, including the assigned Assistant United State's Attorney at the United States Attorney's Office of the District of Maryland.

/s/

JAMES E. CRAWFORD, JR., ESQUIRE